Los Angeles

Pursuant to the Court's June 23, 2008 Case Management and Pretrial Order, Plaintiffs Terri Smith and Michele Smith Fregoso ("Plaintiffs") and Defendant Stonebridge Life Insurance Company ("Stonebridge") submit the following stipulation:

- 1. Plaintiffs have alleged claims for breach of contract and breach of the implied covenant of good faith and fair dealing against Stonebridge. The parties believe that Plaintiffs' claim for breach of contract may be resolved as a matter of law at this time without incurring the expense of further discovery. Therefore, the parties intend to file cross-motions for partial summary judgment on Plaintiffs' claim for breach of contract.
- 2. In its June 23, 2008 Case Management and Pretrial Order, the Court set the hearing on the parties' cross-motions for September 26, 2008 at 9:30 a.m., and ordered the parties to submit a stipulation regarding a briefing schedule.
- 3. The parties have agreed on the following briefing schedule, subject to the Court's approval:

Deadline to file motions: August 13, 2008

• Deadline to file oppositions: August 29, 2008

• Deadline to file reply briefs: September 12, 2008

• Hearing date: September 26, 2008 at 9:30 a.m.

4. Each party reserves the right to file a subsequent motion for summary judgment or partial summary judgment in the future, and expressly reserves the right to address Plaintiffs' claims for breach of the implied covenant of good faith and fair dealing and for punitive damages in any such motions.

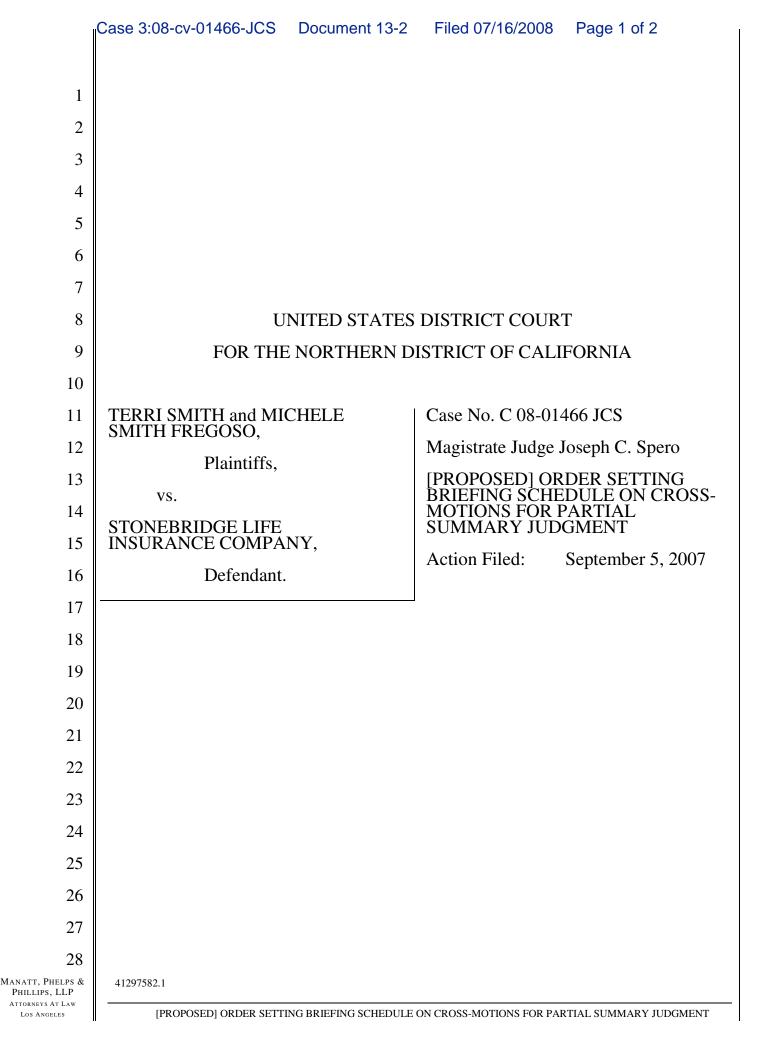
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1	5. The parties respectfully request that the Court approve the parties'			
2	stipulation and enter the proposed order lodged concurrently.			
3	IT IS SO STIPULATED.			
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5	Dated: July 16, 2008	MAN MAR	NATT, PHELPS (RGARET LEVY	& PHILLIPS, LLP
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9		By:	/s/ Joseph E. Laska	a
10			STONEBRIDG COMPANY	efendant EE LIFE INSURANCE
11	Dated: July 16, 2008		NNETT/CASING	
12	JOHN P. STENNETT BARBARA A. CASINO			
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14		By:	/s/ John P. Sten John P. Stennet	nett*
15			Attorneys for P	t laintiffs and MICHELE
16			SMITH FREGO	OSO
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T LAW	STIPULATION SETTING BRIEFING SCHEDULE ON CROSS-MOTIONS FOR PARTIAL SUMMARY JUDGMENT			

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